

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

In re:

Lisa M. Simons

CASE NO. 21-08046  
CHAPTER 13

DEBTOR(S).

NOTICE OF MOTION

TO: Lisa M. Simons 909 E. Krage Drive Addison, IL 60101-4120

Law Offices of Joseph P. Doyle, LLC 105 S Roselle Rd Suite 203 Schaumburg, IL 60193  
Glenn B Stearns 801 Warrenville Road Suite 650 Lisle, IL 60532

PLEASE TAKE NOTICE that on April 15, 2022, at 9:30 a.m., I will appear before the Honorable Janet S. Baer, or any judge sitting in that judge's place, and present the motion of Turner Acceptance Corp. to Modify the Automatic Stay, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government.

No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID. To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID and password. The meeting ID for this hearing is 160 731 2971 and the passcode is 587656. The meeting ID and further information can also be found on Judge Doyle's webpage on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/Michael Dimand

Michael Dimand

CERTIFICATE OF SERVICE

I, MICHAEL DIMAND, an attorney, certify that I served the above-named respondents by placing a copy of the Motion in an envelope, correctly addressed and mailing same by regular mail, postage prepaid in the U.S. Mail chute at 125 E. Lake St., Bloomingdale, Illinois before the hour of 5:00 p.m. on April 2, 2022.

/s/Michael Dimand

Michael Dimand

THIS COMMUNICATION IS FROM A "DEBT COLLECTOR." (15USC 1692a)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re:

Lisa M. Simons

DEBTOR(S).

CASE NO. 21-08046  
CHAPTER 13

MOTION TO MODIFY THE AUTOMATIC STAY

Now Comes the Creditor, Turner Acceptance Corp., by and through its attorney, Michael Dimand, and moves this Court for the entry of an Order Modifying the Automatic Stay and in support thereof, states as follows:

1. That the Creditor is a financial institution licensed to transact business in the State of Illinois.
2. That Creditor is a secured creditor by virtue of a lien upon a certain 2013 Toyota RAV4, VIN #2T3RFREV5DW095347.
3. That the Creditor has been unable to obtain proof of insurance coverage for the subject vehicle, and believes that the vehicle is currently uninsured and at risk of loss to Creditor.
4. That there currently exists due and owing Creditor the total sum of \$25,261.79.
5. That the Creditor herein is not adequately protected as defined by the Bankruptcy Code without insurance coverage, and the Debtor has virtually no equity in the subject property.
6. That the creditor is at immediate risk of irreparable harm.
7. That the Creditor's security is also depreciating faster than the debtor can pay for same, and the Creditor has been and continues to be damaged thereby.
8. No cause exists for a stay of enforcement of an Order Modifying the Stay.

WHEREFORE, Creditor prays as follows:

- a. That the Court enter an Order Modifying the Automatic Stay; and waiving the provisions of Rule 4001 (a)(3);
- b. For such other and further relief as this Honorable Court deems just and equitable.

Respectfully Submitted:

/s/Michael Dimand  
Michael Dimand  
Attorney for Creditor

Michael Dimand  
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